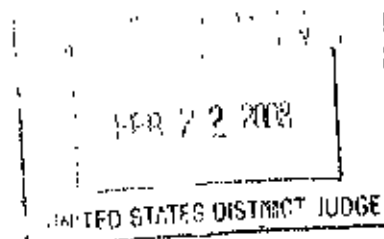


MR, GEORGE DAVIS
Din # 06-A-1168
HALER CREEK A.S.A.T.C.A.
P.O BOX 950.
JOHNSTOWN, NY 12095.



TO.

Hon, Naomi R. Buchwald
U.S. District Judge
U.S. District Court
S.D. of New York
500, Pearl Street.
New York, N.Y 10007.

NOTICE OF MOTION
REQUESTING EXTENTION OF
TIME TO FILE A RESPONSE
DEFENDANTS (FRCP) 12 b(6)
MOTION TO DISMISS COMPLA

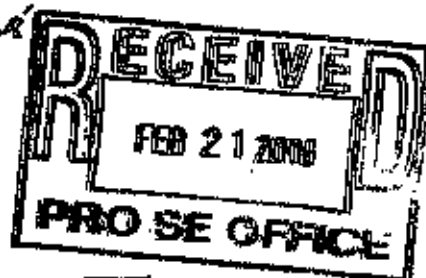
Endorsement

*Plaintiff has until March 14, 2008
to file his response to defendant's
motion. No further extensions should*

RE: DAVIS V. N.Y.S Division of Parole et, al
Index # 07-CIV-5544 (NRB)

be expected. So Ordered.

*Kevin Reese Bunsard, USDS
2/25/08*



Dear, Hon Buchwald

I, George Davis , a pro-se litigant in the above-captioned matter repectfully request for an assignment of counsel and exte ntion of time to file an answer to the Defendants (FRCP) rule 12 b(6) motion treated as summary judgment to MARCH 14,2008.

Please be advised that I am not an attorney and I have very little unfderstanding of the law and it's language which makes it differcult for me to respone to the Defendants motion to dismiss the complaint.

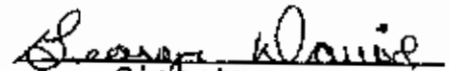
Further I am an inmate currently incarcerated at Hale Creek alcohol substances abuse treatment program, located in Johnstown N.Y a six month treatment program, which is a very small facility with approximately 400 inmates, and the law library has very limited material with only N.Y.S 2d reporters, and NO Federal reporters at all. due to the fact that this facility library

has NO federal reporters which is needed to cite federal case law because all of the case law that the Defendant are citing in his motion to dismiss are federal case law. been that this facility law library has NO federal reporter case law, makes it impossible for me to cite federal case law, since this is a federal § 1983 case I would need to cite federal case law. this is why I am requesting an assignment of counsel along with an extension of time to file an answer to the Defendants (FRCP) 12 b(6) motion to dismiss the complaint, to MARCH 14, 2008.

This assignment of counsel, and extension of time to file an answer to MARCH 14, 2008 will allow me more time to investigate the Defendants 12 b(6) motion more carefully and to seek help from outside resources.

Respectfully Submitted

Dated Feb 15, 2008.
Johnstown, N.Y


Signature

GEORGE DAVIS
Din # 06-A-1168
HALE CREE A.S.A.T.C.
P.O BOX 950.
JOHNSTOWN, NY 120950

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CC